Remarks

Claims 19-30 have been withdrawn. Claims 1-18 are currently pending in the application.

I. Rejection of claims 1-18 under 35 U.S.C. 112, first paragraph

The examiner has rejected claims 1-18 under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. The examiner states that the:

> "... recitation of 'the lamp housing can be remotely positioned in relation to the base by a motor' raises a confusion due to a lacking of a motor in order to perform the feature as remotely positioned the lamp housing." (October 17, 2005 office action, pg. 2, paragraph no. 2).

The applicant respectfully disagrees with the examiner's rejection. The present application specifies:

> "The IPLD 102 may include at least two different housings, such as the base or electronics housing 210 and the lamp housing 230 to facilitate remote positioning of the lamp housing 230 in relation to the base housing 210. ... The lamp housing 230 may be connected to a bearing mechanism 225 that facilitates pan and tilting of the lamp housing 230 in relation to the base or electronics housing 210. The bearing mechanism 225 is shown simplified. The motors that would be used for pan and tilt are not shown for simplification. (Present application, pg. 10, last paragraph).

The present application also states that:

> "The motor control 318 provides the driving signals to the motors that may be used with the lens 368, the variable homogenizing system actuator 361 and for pan and tilt motors (not shown for simplification)." (Present application, pg. 10, first paragraph).

The motor control 318, of one embodiment of the present invention, can receive control signals, remotely, from the central controller 150 (such as through the microprocessor 316 and/or memory 315) including commands for varying parameters of the image projection lighting device. (Present application, Fig. 1, pg. 12, second paragraph, pg. 10, paragraph 2).

The present application also incorporates by reference two patents which generally refer

to the remote control of parameters of an image projection lighting device. (Present application, pg. 12, last paragraph – pg. 13, first paragraph; U.S. Patent No. 6,331,756, col. 1, lns. 13-22; and U.S. Patent No. 6,605,907, col. 1, lns. 24-35). The present application also discloses in its background section that multiparameter lighting fixtures, "illustratively are light fixtures having two or more individually remotely adjustable parameters such as focus, color, image, position, or other light characteristics." (Present application, background section, first paragraph).

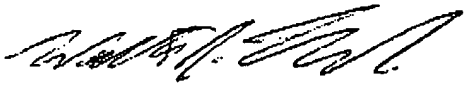
The fact that a motor is not shown in a drawing for remotely positioning the lamp housing in relation to the base is irrelevant, as indicated by the Federal Circuit:

> "Nothing more than objective enablement is required, and therefore it is irrelevant whether this teaching is provided through broad terminology or illustrative examples." (In re Wright, 999 F.2d 1557 (C.A. Fed. Cir. 1993) citing In Re Marzocchi, 439 F.2d 220, at 223, 169 U.S.P.Q. 367 at 369 (CCPA 1971).

II. Conclusion

Claims 1-18 are submitted to be allowable. Favorable reconsideration of this application, is respectfully requested.

Respectfully submitted,



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